

AO 91 (Rev. 08/09) Criminal Complaint

FILED

UNITED STATES DISTRICT COURT

JUN 14 2022

for the

Northern District of Oklahoma

Mark C. McCartt, Clerk
U.S. DISTRICT COURT

United States of America

v.

Joshua Wayne Willis

Defendant(s)

Case No.

22-mj-379-JFJ

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of June 12, 2022 in the county of Tulsa in the Northern District of Oklahoma, the defendant(s) violated:

Code Section
18 U.S.C. §§ 1151, 1152, and 1201

Offense Description
Kidnapping in Indian Country

This criminal complaint is based on these facts:

See Attached Affidavit

☒ Continued on the attached sheet.

Michael Stone

Complainant's signature

Special Agent Michael Stone

Printed name and title

Sworn to before me by phone.

Date:

6/14/22

Jodi F. Jayne

Judge's signature

City and state:

Tulsa, OK

Jodi F. Jayne, United States Magistrate Judge

Printed name and title

**Affidavit in Support of an Arrest Warrant
in the Northern District of Oklahoma**

I, Michael Stone, being duly sworn under oath, do hereby depose and state:

INTRODUCTION AND AGENT BACKGROUND

1. I have been employed as a Federal Bureau of Investigation (FBI) Special Agent since 2020. As a result of my employment with the FBI, my duties include, but are not limited to, the investigation and enforcement of assaults, narcotics, street gang related crimes, armed robberies, and murder.
2. As part of my duties as a Special Agent, I investigate criminal violations relating to crime in Indian Country, to include Kidnapping in violation of 18 U.S.C. §§ 1151, 1153, and 1201 in Indian Country. I have received over 2,500 hours of law enforcement training to include interview and interrogation courses, drug investigations, death investigations, and violent criminal apprehension training. I have worked in a sworn law enforcement capacity since 2015 at the local, state, and federal level.
3. The facts and statements in this affidavit are based in part on information provided by other law enforcement officers and on my personal observations and training and experience as an Agent for the FBI. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not set forth all my knowledge about this matter.
4. It is my belief that a non-Indian male known as Joshua Wayne Willis (DOB xx-xx-1997; SSN xxx-xx-5936), has violated 18 U.S.C. §§ 1151, 1152,

and 1201 - Kidnapping in Indian Country that on or about June 12, 2022, Joshua Wayne Willis did kidnap E.A., an Indian female, in the Northern District of Oklahoma. The kidnapping took place in Tulsa County, within the boundaries of Cherokee Nation Reservation, which is within "Indian Country," as that term is defined under 18 U.S.C. § 1151.

PROBABLE CAUSE

5. On June 12, 2022, at approximately 4:14 PM, Tulsa Police Department (TPD) were dispatched to 1822 North Trenton Avenue, Tulsa, Oklahoma (WILLIS and E.A.'s residence) in reference to a kidnapping.

6. WILLIS called 911 and stated he had a hostage, his ex-girlfriend E.A. WILLIS stated if law enforcement did not bring him a car, money, and a pack of American Spirits, WILLIS would do something to E.A. Dispatch advised they could hear a female in the background of the call arguing with the caller to leave and be let go. WILLIS called 911 again and advised if he saw law enforcement with their guns out, WILLIS would use his gun by shooting at law enforcement and E.A. WILLIS stated he had a firearm with a full magazine and a butcher knife. WILLIS stated he had A.E. tied up in the bathroom.

7. Law enforcement was able to contact E.A. on E.A.'s cell phone. E.A. stated she tried to escape from the bathroom of the residence multiple times. E.A. escaped from the bathroom but was caught in the living room by WILLIS in the living room and was held down by WILLIS. E.A. stated she could see a firearm in WILLIS' pocket the entire duration of the incident.

8. Law enforcement forced entry into the residence and placed WILLIS into custody. A CO2 powered air soft pistol was in the front right pocket of WILLIS' pants.

9. On June 12, 2022, your affiant arrived at David L. Moss Criminal Justice Center and interviewed WILLIS in the booking area. I advised WILLIS of his *Miranda* rights. WILLIS signed a *Miranda* rights waiver and agreed to speak with me. During the interview, WILLIS confirmed he held E.A. against her will inside the residence. WILLIS stated his intentions were not to harm law enforcement nor E.A. but made the threats in order to provoke law enforcement to kill him. WILLIS did not want to live anymore and tried to kill himself earlier in the day by inhaling a chemical mixture. After the chemical mixture did not work, WILLIS wanted to provoke law enforcement to shoot him. WILLIS did not believe law enforcement would kill him if he let E.A. leave the residence so he kept her from leaving the residence against her will. WILLIS stated the firearm he spoke about with law enforcement was found in his front right pocket when TPD took him into custody.

10. WILLIS told agents he was not an enrolled member of any federally recognized tribe. E.A. provided law enforcement with her Cherokee Nation role number. Using publicly available maps, your affiant has confirmed 1822 North Trenton Avenue, Tulsa, Oklahoma, where WILLIS kidnapped E.A., is within the boundaries of Cherokee reservation.

CONCLUSION

Based on the information set forth in this affidavit, I submit there is probable cause to believe that Joshua Wayne WILLIS has violated 18 U.S.C. §§ 1151, 1152, and 1201 - Kidnapping in Indian Country.

Respectfully submitted,

Michael Stone

Michael Stone, Special Agent
Federal Bureau of Investigation

Subscribed and sworn via phone on the 14th day of June, 2022.

Jodi Jayne

JODIE F. JAYNE
UNITED STATES MAGISTRATE JUDGE